Approved by OMB1
Control No.: 3150-0183
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INTEGRATED MATERIALS PERFORMANCE EVALUATION PROGRAM
QUESTIONNAIRE

Reporting Period: April 13, 2018 – May 6, 2022

Note: If there has been no change in the response to a specific question since the last IMPEP questionnaire, the State or Region may copy the previous answer, if appropriate.

GENERAL

1. Please prepare a summary of the status of the State's or Region's actions taken in response to each of the open recommendations from previous IMPEP reviews.

Response:

There were no open recommendations from the 2018 IMPEP review.

COMMON PERFORMANCE INDICATORS

Technical Staffing and Training

Please provide the following organization charts, including names and positions:

A chart showing positions from the Governor down to the Radiation Control Program Director;

A chart showing positions of the radiation control program, including management; and

Equivalent charts for sealed source and device evaluation, low-level radioactive waste and uranium recovery programs, if applicable.

Response:

See Attachment A.

3. Please provide a staffing plan, or complete a listing using the suggested format below, of the professional (technical) full-time equivalents (FTE) applied to the radioactive materials program by individual. Include the name, position, and, for Agreement States, the fraction of time spent in the following areas: administration, materials licensing & compliance, emergency response, low-level radioactive waste, uranium recovery, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the radioactive materials program.

If consultants were used to carry out the program's radioactive materials responsibilities, include their efforts. The table heading should be:

Name Position Area of Effort FTE%

Response:

Name	Position	Area of effort	FTE%
James Grice	Program Manager	Management	100%
Phillip Peterson	Unit Leader	Management	100%
Derek Bailey	Licensing Lead	Licensing Emergency Response	90% 10%
Ramon Li	Inspection Lead	Inspections Emergency Response	90% 10%
Carrie Romanchek	License reviewer and inspector	Licensing and compliance Emergency response	90% 10%
Heather Gilbert	License reviewer and inspector	Licensing and compliance Emergency response	90% 10%

Matt Gift	License reviewer and inspector	Licensing and compliance Emergency response	90% 10%
Meghan Cromie	License reviewer and inspector	Licensing and compliance Emergency response	90% 10%
Tim Thorvaldson	License reviewer and inspector	Licensing and compliance Emergency response	90% 10%
Will Hageman	License reviewer and inspector	Licensing and compliance Emergency response	90% 10%
Kathryn Kirk (Mote)	General license coordinator	GL registrations, reciprocity	100%
James Jarvis	Regulations coordinator	Compatibility Emergency response	90% 10%
Shiya Wang	Uranium work lead	Uranium recovery Emergency response	90% 10%

Please provide a listing of all new professional personnel hired into your radioactive materials program since the last review, indicate the date of hire; the degree(s) they received, if applicable; additional training; and years of experience in health physics or other disciplines, as appropriate.

Response:

Name	Date of hire	Highest degree received	Additional training	Years of experience
Meghan Cromie	3/18/2019	Ph.D. in Environmental Toxicology	NRC training courses	3+ years as RAM unit staff
Carrie Romanchek	4/1/2019 (rehire)	B.A. in Classics	NRC training courses	6+ years as RAM unit staff, previous experience at CU-Boulder
Heather Gilbert	2/1/2021	Masters in Environmental Science	NRC training courses	1+ year as RAM unit staff, 2 years as environmental scientist including NORM management
Joel Doebele	3/8/2021	M.S. in Health Physics	NRC training courses	10 years health physicist experience
Will Hageman	7/19/2021	B.A. in Environmental Studies	NRC training courses	<1 year as RAM unit staff; 4 years as Machinist Mate-Nuclear (Navy)

Please list all professional staff who have not yet met the qualification requirements for a radioactive materials license reviewer or inspector. For each, list the courses or equivalent training/experience they need and a tentative schedule for completion of these requirements.

Response:

Will Hageman has completed NRC course G-108 (Inspection Procedures), H-117S (Introductory Health Physics Self-Study), H-122S (Fundamental Health Physics Self-Study), and H-308S (Transportation of Radioactive Materials). Will needs additional experience in licensing and inspections and is tentatively scheduled for certification in portable moisture / density gauges this summer.

Identify any changes to your qualification and training procedure that occurred during the review period.

Response:

No changes to the qualification and training procedure during the review period.

Please identify the technical staff that left your radioactive materials program during the review period and indicate the date they left.

Response:

Joel Doebele, 12/17/2021

Peter Rottenborn, 02/12/2021

Mark Dater, 06/19/2020

Cheri Douglas (Hall), 09/04/2018

List any vacant positions in your radioactive materials program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.

Response:

The program has a vacancy in the TENORM/Uranium recovery group. The position was vacated in December of 2021 and the program is in the process of conducting interviews in April of 2022 to fill that position.

For Agreement States, does your program have an oversight board or committee which provides direction to the program and is composed of licensees and/or members of the public? If so, please describe the procedures used to avoid any potential conflict of interest.

Response:

As required by Colorado Radiation Control Act, the Radiation Program has a nine member, governor appointed committee which provides technical guidance and advice to the program. The statute requires that there be three representatives from each of the following areas: higher education, healing arts, and industry, and that no more than four be from any one political party. There is not a specific requirement that the representatives be licensees, although eight of the current committee members are affiliated with Colorado licensees. The committee is governed by bylaws, statute, and executive orders which address conflict of interest issues.

Status of Materials Inspection Program

10. Please identify individual licensees or categories of licensees the State is inspecting less frequently than called for in NRC's Inspection Manual Chapter (IMC) 2800 and explain the reason for the difference. The list only needs to include the following information: license category or licensee name and license number, your inspection interval, and rationale for the difference.

Response:

Colorado follows IMC 2800 for inspection frequencies and does not inspect any facilities less frequently. The Colorado Inspection Manual was last updated in August 2020 and matches the revision of IMC 2800 issued March 2, 2020. For program code 03900, the Office of Nuclear Materials Safety and Safeguards Program Code Descriptions and Inspection Priorities has a priority code D. Colorado inspects sites that are actively decommissioning annually and sites that have completed decommissioning and are in long term care every three years.

11. Please provide the number of routine inspections of Priority 1, 2, and 3 licensees, as defined in IMC 2800 and the number of initial inspections that were completed during each year of the review period.

Response:

4/13/18 – 12/31/18: Routine priority 1, 2, 3: 32. Initial: 5.

1/1/19 – 12/31/19: Routine priority 1, 2, 3: 54. Initial: 7.

1/1/20 – 12/31/20: Routine priority 1, 2, 3: 29. Initial: 11.

1/1/21 – 12/31/21: Routine priority 1, 2, 3: 45. Initial: 13.

1/1/22 – 4/18/22: Routine priority 1, 2, 3: 21. Initial: 2.

12. Please submit a table, or a computer printout, that identifies inspections of Priority 1, 2, and 3 licensees and initial inspections that were conducted overdue.

At a minimum, the list should include the following information for each inspection that was conducted overdue during the review period:

(1) Licensee Name
(2) License Number
(3) Priority (IMC 2800)
(4) Last inspection date or license issuance date, if initial inspection
(5) Date Due
(6) Date Performed

(7) Amount of Time Overdue
(8) Date inspection findings issued

Response:

Note: the inspections below do not take into account inspections performed overdue due to the covid-19 public health emergency. Please refer to the written response to temporary instructions TI-003 for those inspections.

Licensee Name	License Number	Priority	Last inspection date	Date due	Date performed	Time overdue	Findings issued
Sweeney Mining and Milling	CO 149-01	2	4/28/15	4/28/17	5/22/18	24 days	5/22/18
Glacier View Meadows Water & Sewer Association	CO 1283-01	5 (initial)	-	5/27/21	5/28/21	1 day	6/14/21
Cal-Cert Company	CO 1295-01	5 (initial)	-	9/22/21	10/19/21	27 days	10/19/21

Causes of overdue inspections:

Sweeney Mining and Milling: A delay in the deliverance of the 2015 inspection results and the subsequent delayed recording of that delivery in WBL caused the normally automatically created WBL inspection ID and associated inspection due date to be created incorrectly. As a result, the correct inspection window and due date were not included on the inspection schedule. Once the unit became aware of the error the facility was promptly inspected. In order to avoid a potential future repeat error, the unit will now create future inspection IDs in WBL manually if there is a lengthy delay in closing an inspection.

Cal-Cert Company: the assigned inspector reached out to the licensee prior to the inspection due date to schedule the inspection. No responses were received from the radiation safety officer or the corporate office until after the inspection due date when the department was notified by the corporate office that the radiation safety officer was no longer with the company. A virtual inspection with the corporate radiation safety officer was conducted.

13. Please submit a table or computer printout that identifies any Priority 1, 2, and 3 licensees and initial inspections that are currently overdue, per IMC 2800. At a minimum, the list should include the same information for each overdue inspection provided for Question 12 plus your action plan for completing the inspection. Also include your plan for completing the overdue inspections.

Response:

As of April 18, 2022, there are no inspections that are currently overdue. Additionally, there are no inspections that will become overdue between April 18, 2022 and May 6, 2022.

14. Please provide the number of reciprocity licensees that were candidates for inspection per year as described in IMC 1220 and indicate the number of reciprocity inspections of candidate licensees that were completed each year during the review period.

Response:

IMC 1220 is no longer active with prescriptive reciprocity inspections (NRC change notice 20-012). Colorado performs reciprocity inspections with the following number of reciprocity inspections performed during the review period:

4/13/18 – 12/31/18: 11
1/1/19 – 12/31/19: 9
1/1/20 – 12/31/20: 4
1/1/21 – 12/31/21: 4
1/1/22 – 4/18/22: 1

The decreasing number of performed reciprocity inspections is primarily due to COVID-19 restrictions, both with restrictions on performing all inspections and then with putting an emphasis on conducting routine inspections that were delayed. It is anticipated that reciprocity inspections will resume with more frequency during the next review period.

Technical Quality of Inspections

15. What, if any, changes were made to your written inspection procedures during the reporting

period?

Response:

The inspection manual was revised in August 2020. The changes to the inspection manual were primarily based on changes to the NRC IMC 2800 (initial inspections could be extended up to 18 months if the licensee did not possess radioactive materials in the first 12 months; the inspection window was increased to +/- 50% for priority code 1 licensees and increased to +/- 1 year for priority code 2, 3, 4, and 5 licensees; the removal of the requirement to inspect at least 20% of NRC-eligible reciprocity licensees; and updating Appendix A [the program codes for licensee type]). Additional edits to the manual included adding information regarding inspections of provisional licensees and adding information on conducting remote inspections.

The internal WBL guidance was updated in August 2021 to reflect updates that have been made to the WBL program as well as updates to entering in data to the database and minor edits to how documentation is processed by the program.

16. Prepare a table showing the number and types of supervisory accompaniments made during the review period. Include:

Inspector Supervisor License Category Date

Response:

Inspector	Supervisor	License Category	Date
Carrie Romanchek	Ramon Li	3.P	8/6/2019 (II 128080)
Carrie Romanchek	Ramon Li	3.O	8/9/2019 (II 152408)
Carrie Romanchek	Ramon Li	3.P	6/18/2021 (II 133136)
Heather Gilbert	Ramon Li	3.P	1/21/2022 (II 172517)
Mark Dater	Phillip Peterson	7.C (HDR only)	12/21/2018 (II 133562)
Mark Dater	Ramon Li	7.C	4/16/2019 (II 131692)
Mark Dater	Ramon Li	7.C (7.62)	11/04/2019 (II 143863)
Matt Gift	Phillip Peterson	3.P	4/19/2018 (II 126975)
Matt Gift	Ramon Li	7.C (7.30, 32, 36)	3/12 - 3/22/2019 (II 131688)
Matt Gift	Phillip Peterson	3.B	1/24/2019 (II 126505)
Matt Gift	Ramon Li	3.O	12/10/19 - 1/24/20 (II 154191)
Matt Gift	Ramon Li	7.C (HDR)	2/13/2020 (II 143564)
Matt Gift	Ramon Li	3.B	8/17/2021 (II 132780)
Matt Gift	Ramon Li	7.C (7.62)	12/6 - 12/16/2021 (II 154256)
Meghan Cromie	Ramon Li	3.P	12/19/2019 (II 127785)
Meghan Cromie	Ramon Li	3.P	9/10 - 9/29/20 (II 131173)
Meghan Cromie	Ramon Li	3.N	12/9/2021 (reciprocity)
Meghan Cromie	Ramon Li	7.C (7.30, 32, 36, 62)	3/29/2022 (II 154516)
Peter Rottenborn	Phillip Peterson	3.P	11/15/2018 (II 126997)
Peter Rottenborn	Ramon Li	7.C (7.30, 32, 36)	3/21/2019 (II 133691)
Peter Rottenborn	Ramon Li	5.A	4/2/2019 (II 133697)
Peter Rottenborn	Ramon Li	7.C (7.62)	9/18/2019 (II 142911)
Peter Rottenborn	Ramon Li	7.C (HDR)	11/14/2019 (II 133856)
Phillip Peterson	Jim Grice	3.E	12/13/2018 (II 126748)
Ramon Li	Phillip Peterson	7.A	8/31/2018 (II 127263)
Ramon Li	Phillip Peterson	7.B	2/4 - 2/7/2019 (II 133943)
Ramon Li	Phillip Peterson	3.O	9/24/2020 (II 163371)
Ramon Li	Phillip Peterson	5.A	10/20/2021 (II 154132)
Shiya Wang	Phillip Peterson	2.C	5/25/2018 (II 144221)
Shiya Wang	Ramon Li	4.A	12/17/2019 (II 154062)
Shiya Wang	Ramon Li	14.A	12/3/2020 (II 161605)
Shiya Wang	Ramon Li	2.C	12/28/2021 (II 169131)
Tim Thorvaldson	Phillip Peterson	3.M	8/7/2018 (II 126491)
Tim Thorvaldson	Phillip Peterson	7.C (7.30, 32, 36)	10/18/2018 (II 131177)

Tim Thorvaldson	Ramon Li	3.L	4/8 - 4/11/2019 (II 130745)
Tim Thorvaldson	Ramon Li	3.C	8/27 - 9/11/2019 (II 143813)
Tim Thorvaldson	Ramon Li	7.C (HDR)	3/6/2020 (II 154420)
Tim Thorvaldson	Ramon Li	7.C (7.62)	3/23/2021 (II 166917)
Tim Thorvaldson	Ramon Li	7.B, 7.C (7.42)	4/27 - 4/28/2021 (II 153789)
Missing accompaniments: Peter Rottenborn (2020) and Carrie Romanchek (2020)			

17. Describe or provide an update on your instrumentation, methods of calibration, and laboratory capabilities. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available throughout the review period?

Response:

CDPHE has the following instrumentation currently available to use for inspections:

- 4 Bicron micro-rem meters to measure dose rate
- 1 Eberline PRM-7 meter to measure dose rate
- 2 Inovision 451B meters to measure dose rate
- 10 Ludlum model 3 meters with GM probes to measure contamination
- 1 Ludlum model 3 meter with a 2x2 NaI detector
- 3 Ludlum model 19 meters to measure dose rate
- 4 Ludlum model 2 meters with GM probes to measure contamination
- 2 Ludlum model 9 meters with ion chambers to measure dose rate
- 1 Ludlum model 2241 scaler with multiple probes
- 1 Ludlum model 12-4 meter to measure neutron dose rate
- 1 Ludlum model 12 meters with NaI probe to measure contamination
- 3 Ludlum model 12 meters with GM probe to measure alpha contamination
- 1 Ludlum model 12 meter with multiple probes
- 1 Ludlum model 15 meter to measure neutron dose rate
- 1 SE International Inspector + meter to measure dose rate and contamination
- 1 Victoreen 450B with ion chamber to measure dose rate
- 1 Victoreen 290 with GM probe to measure contamination
- 1 FLIR Radiation, Inc. IdentiFinder 2 for field isotope identification
- 1 Berkeley SAM for field isotope identification
- 1 ThermoFisher RadEye PRD-ER meter to measure dose rate
- 1 Bicron Analyst meter to measure contamination

All meters are calibrated on an annual basis and have been calibrated within the last year. Meters are calibrated at Ludlum Measurements, Inc. or at ThermoFisher. Any meter found to be out of calibration or not working properly is removed from service until required calibrations or maintenance is performed.

Any samples requiring liquid scintillation, gamma spectroscopy, or radiochemical analysis are sent to an accredited radiochemistry laboratory.

All instruments have been properly calibrated during the review period. Sufficient instrumentation was available during the review period.

Technical Quality of Licensing Actions

18. How many specific radioactive material licenses does your program regulate at this time?

Response:

As of April 18, 2022, Colorado has 312 specific radioactive materials licensees, 10 of which are provisional.

19. Please identify any major, unusual, or complex licenses which were issued, received a major amendment, were terminated, decommissioned, submitted a bankruptcy notification or renewed in this period.

Response:

Licensee	License number, amendment number	Mail Control Number	Date issued	Action
Evraz Rocky Mountain Steel	CO 250-02, A08	614000	12/17/2019	Amendment, addition of new device type
Centura Health Penrose	CO 197-02, A136	611912	06/22/2020	Amendment, addition

- St. Francis Health Services				of new device type (Ruby-Fill®)
Disa, Inc.	CO 1312-01 A00 (not issued)	630049	Never issued, applicant withdrew request	New license application, proposed use of ablation for remediation under a source materials license, Department determined that the operations were subject to uranium recovery requirements and a milling license.

20. Discuss any variances in licensing policies and procedures or exemptions from the regulations granted during the review period.

Response:

Swedish Medical Center, license CO 251-02, amendment 51, mail control number 602474. This variance allowed neurodiagnostic technologists, under the supervision of an authorized user, an exemption from appendix 7N training requirements to administer technetium-99m doses to patients undergoing brain imaging seizure studies. Due to the time sensitive nature of the test, a nuclear medicine technologist is unable to perform the injection. Through procedures and training provided, the health and safety of all involved will be preserved in accord with the spirit of the regulatory requirements.

ProTechnics, Division of Core Laboratories LLP, license CO 545-01, amendment 35, mail control number 608724. This variance allowed an alternative disposal for subsurface tracer study wastes to a solid waste disposal site. Wastes are limited to less than 400 pCi/g of scandium-46 (half-life equal to 83.8 days), 200 pCi/g of antimony-124 (half-life equal to 60.2 days), and 400 pCi/g of iridium-192 (half-life equal to 73.8 days) in the form of ZeroWash® ceramic beads. The alternative disposal of these materials is similar to the NRC technical evaluation report found in ML16020A283 and followed the NRC guidance for disposal procedures and transfers under 10 CFR 20.2002. The dose assessments at the solid waste disposal site demonstrated that workers would be exposed to less than 7 mrem per year from the waste disposal. The solid waste disposal site also received a variance to receive and dispose of well-logging sandouts and well returns that contain the radioactive materials as mentioned above.

21. What, if any, changes were made in your written licensing procedures (new procedures, updates, policy memoranda, etc.) during the reporting period?

Response:

A guidance document for licensing actions was created by consolidating and updating notes from previous internal licensing meetings. This guidance document is intended to be updated periodically by the licensing lead or the unit leader.

The internal WBL guidance was updated in August 2021 to reflect updates that have been made to the WBL program as well as updates to entering in data to the database and minor edits to how documentation is processed by the program.

All license templates were updated for correct CDPHE branding and ADA compliance. As needed, minor corrections were made as needed to correct typos, implement a consistent use of Item vs. Condition in licenses, and remove ‘RH’ language from license templates.

22. Identify by licensee name and license number any renewal applications that have been pending for one year or more. Please indicate why these reviews have been delayed and describe your action plan to reduce the backlog.

Response:

As of April 18, 2022, there are no open renewals that have been pending for one year or more. Additionally, there are no open renewals that will have been pending for one year or more between April 18, 2022 and May 6, 2022.

V. Technical Quality of Incident and Allegation Activities

23. For Agreement States, please provide a list of any reportable incidents not previously submitted to NRC (See Procedure SA-300, *Reporting Material Events*, for additional guidance, OMB clearance

number 3150-0178). The list should be in the following format:

Licensee Name License # Date of Incident/Report Type of Incident

Response:

The program is unaware of any reportable incidents not previously submitted to the NRC.

24. Identify any changes to your procedures for responding to incidents and allegations that occurred during the period of this review.

Response:

No changes were made to the procedures for responding to incidents and allegations during the review period.

NON-COMMON PERFORMANCE INDICATORS

Compatibility Requirements

25. Please list all currently effective legislation that affects the radiation control program. Denote any legislation that was enacted or amended during the review period.

Response:

Colorado's radiation control authority and regulations are authorized by Title 25, Article 11, C.R.S. Colorado's legislature is a part time legislative body, with each regular session taking place January through May of each year. Legislation enacted during the regular session typically takes effect by August of the same year pending approval by the Governor.

During the review period, Colorado's enabling legislation was amended in 2018 and 2019.

- The 2018 legislation change was initiated by the department and repealed a prohibition against the adoption of rules concerning the disposal of NORM and TENORM materials.
- The 2019 legislation change was initiated by the legislature Statutory Revision Committee to make minor wording changes for consistency with other legislation. The change clarified statutory language allowing members of the Radiation Advisory Committee to be compensated for their actual and necessary expenditures.

26. Are your regulations subject to a "Sunset" or equivalent law? If so, explain and include the next expiration date for your regulations.

Response:

Under the State Administrative Procedure Act, the Colorado legislature is authorized each year to "sunset" agency regulations adopted or amended between November 1st and October 31st if they are found to exceed the rulemaking authority of the agency or are inconsistent with law. C.R.S. § 24-4-103(8)(c)(I). When such a finding is made, the regulations are designated to expire the following May 15th. Additionally, each year after Colorado's legislative session, the Office of Legislative Legal Services reviews existing regulations to determine if they are in conflict with laws enacted during that legislative session. Historically, the Colorado Rules and Regulations Pertaining to Radiation Control have always been approved for continuation each year, as such regulations are necessary for Colorado to maintain its authority under the agreement with the NRC, consistent with the state's policy. C.R.S. § 25-11-102.

27. Please review and verify that the information in the enclosed State Regulation Status (SRS) sheet is correct. For those regulations that have not been adopted by the State, explain why they were not adopted, and discuss actions being taken to adopt them. If legally binding requirements were used in lieu of regulations and they have not been reviewed by NRC for compatibility, please describe their use.

Response:

Colorado has reviewed the Colorado State Regulation Status (SRS) sheet and believes it to be correct.

Since the prior IMPEP in April 2018, Colorado has submitted draft and final rule packages to address five NRC Regulatory Action Tracking System (RATS) items due during the current review period. Additionally, during the current review period Colorado has submitted draft and final rule packages ahead of schedule for five RATS items that are not due until the next review period (after May 2022).

Three RATS items (2020-3, 2021-1, and 2021-2) are all due during the next review period (late 2023 and beyond) but are scheduled for completion in December 2022.

28. If you have not adopted all amendments within three years from the date of NRC rule promulgation, briefly describe your State's procedures for amending regulations in order to maintain compatibility with the NRC, showing the normal length of time anticipated to complete each step.

Response:

The program strives to complete all NRC driven regulatory amendments within 3 years of NRC's rule promulgation. All state agencies in Colorado are required to plan and provide notice for future regulatory changes at least one year in advance. Each November a regulatory agenda is established which outlines the rulemaking schedule for the following calendar year. The NRC rule change issuance date will determine whether Colorado's rulemaking activity to address federal

rule changes will take place in the 2nd or possibly 3rd year following NRC issuance. Except where a regulatory change may be particularly controversial, most rulemaking efforts can typically be completed within approximately 9-18 months.

During the current review period, Colorado provided proposed and final rule packages prior to the adoption date for five RATS items, including 2015-3, 2015-4, 2015-5, 2018-1, and 2018-2. Also within the current IMPEP review period, Colorado completed proposed and final rule packages for RATS items 2018-3, 2019-1, 2019-2, 2020-1, and 2020-2 which are not due until the next review period (after May 2022). The remaining three RATS items due in the next IMPEP review period are in-process and are scheduled for completion by the end of 2022.

II. Sealed Source and Device (SS&D) Evaluation Program

29. Prepare a table listing new and amended (including transfers to inactive status) SS&D registrations of sources and devices issued during the review period. The table heading should be:

SS&D Registry Number	Manufacturer, Distributor or Custom User	Product Type or Use	Date Issued	Type of Action

Response:

SS&D Registry Number	Manufacturer, Distributor or Custom User	Product Type of Use	Date Issued	Type of Action
CO-1012-D-101-S	Thermo MF Physics, LLC	Neutron generation tube	12/26/2018	Amendment, new model added

30. Please include information on the following questions in Section A, as they apply to the SS&D Program:

Technical Staffing and Training - Questions 2-9

Response:

See Common Performance Indicator responses. The following staff members have been trained to perform SS&D evaluations: James Grice, Phillip Peterson, Ramon Li, James Jarvis.

Technical Quality of Licensing Actions - Questions 18-22

Response:

See Common Performance Indicator responses. Colorado currently has three licensees that have four SS&D sheets issued (1 to Hazen Research, Inc. (CO 1098-01), 1 to Particle Measuring Systems (CO 1073-01), and 2 to Thermo MF Physics (CO 803-02)).

Technical Quality of Incident and Allegation Activities - Questions 23-24

Response:

See Common Performance Indicator responses. Incident and allegations for SS&Ds are handled as part of the overall incident and allegation program.

III. Low-level Radioactive Waste Disposal Program

31. Please include information on the following questions in Section A, as they apply to the Low-Level Radioactive Waste Disposal Program:

Technical Staffing and Training - Questions 2-9
Status of Materials Inspection Program - Questions 10-14
Technical Quality of Inspections - Questions 15-17
Technical Quality of Licensing Actions - Questions 18-22
Technical Quality of Incident and Allegation Activities - Questions 23-24

Response:

See Common Performance Indicator responses. Colorado has one potential low-level radioactive waste disposal license, Clean Harbors Deer Trail, which is authorized to accept for disposal NORM and TENORM. This licensee is regulated as any other licensee.

IV. Uranium Recovery Program

32. Please include information on the following questions in Section A, as they apply to the Uranium Recovery Program:

Technical Staffing and Training - Questions 2-9
Status of Materials Inspection Program - Questions 10-14
Technical Quality of Inspections - Questions 15-17
Technical Quality of Licensing Actions - Questions 18-22
Specifically Question 19: the entry regarding Disa, Inc. was received as a non-uranium recovery application but the program determined the activities to be subject to the uranium recovery regulatory scheme.
Technical Quality of Incident and Allegation Activities - Questions 23-24

Response:

See Common Performance Indicator responses. All uranium recovery licensees are in various phases of decommissioning and are regulated as all other licensees.

MATERIALS REQUESTED TO BE AVAILABLE FOR
THE ON-SITE PORTION OF AN IMPEP REVIEW

Please have the following information available for use by the IMPEP review team when they arrive at your office:

List of open license cases, with date of original request, and dates of follow-up actions.
List of licenses terminated during review period.
Copy of current log or other document used to track licensing actions.
List of all licensing actions completed during the review period (sorted by license reviewer, if possible).
Copy of current log or other document used to track inspections.
List of all inspections completed during the review period (sorted by inspector, if possible).
List of inspection frequencies by license type.
List of all allegations occurring during the review period. Show whether the allegation is open or closed and whether it was referred by NRC.
List of all licenses that your agency has imposed additional security requirements upon.

ALSO, PLEASE HAVE THE FOLLOWING DOCUMENTS AVAILABLE:

All State regulations

Statutes affecting the regulatory authority of the State program

Standard license conditions

Technical procedures for licensing, model licenses, review guides

SS&D review procedures, guides, and standards

Instrument calibration records

Inspection procedures and guides

Inspection report forms

Documented training plan, if applicable

Records of results of supervisory accompaniments of inspectors

Emergency plan and communications list

Procedures for investigating allegations

Procedures for investigating incidents

Enforcement procedures, including procedures for escalated enforcement, severity levels, civil penalties
(as applicable)

Job descriptions